

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 20-CR-26

YOUSSEF BARASNEH,

Defendant.

UNOPPOSED MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

Yousef Barasneh moves this Court to modify the conditions of his pretrial release. Specifically, he asks only that the Court modify the location restriction component of his release conditions by changing his status from “curfew” to “open schedule” status while maintaining the condition that he wear an ankle bracelet with its GPS monitoring capability. As grounds for this motion, undersigned counsel states the following:

1. On January 17, 2020, the Court released Barasneh on conditions that included location monitoring at the home detention level. *See* R. 4, Order Setting Conditions of Release. Currently, Barasneh is on “curfew” status.

2. Over the last month, Barasneh’s counsel has had discussions with Assistant United States Attorney Ben Proctor and United States Probation Officer Rebecca Capstick regarding a modification of these conditions. The parties have agreed that, with the Court’s approval, Barasneh can move from “curfew” to “open schedule” status. The parties do not ask the Court to remove the location monitoring component of Barasneh’s

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pretrial release conditions, which includes GPS monitoring and exclusion zones as set forth in the order. *See Id.*

For these reasons, Yousef Barasneh respectfully asks this Court to modify the location restriction component of his pretrial release conditions by changing his status from “curfew” “open schedule” status.

Dated at Milwaukee, Wisconsin, this 5th day of March, 2021.

Respectfully submitted,

/s/ John W. Champion

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